

THE CITY OF NEW YORK

LAW DEPARTMENT

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February 19, 2008

VIA FACSIMILEHonorable Michael H. Dolinger
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Zhao v. City of New York, et al., 07 CV 3636 (LAK) (MHD)

Your Honor:

END. PSE) order

Application granted. Defendants to provide their written response by no later than Feb. 22, 2008.

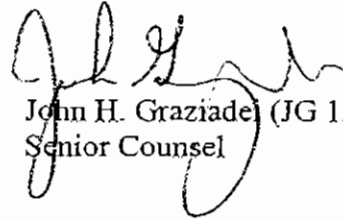
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2/20/08

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants in the above-referenced litigation and write with respect to plaintiff's letters to the Court of February 15, 2008 and February 19, 2008, which I received today, seeking an order endorsing plaintiff's proposed schedule for depositions and raising other discovery matters. By Order dated February 15, 2008, also received today, the Court ordered defendants to respond to plaintiff's application by today, February 19, 2008. For the reason set forth herein, defendants respectfully request an enlargement of time until February 22, 2008 to respond to plaintiff's application. Defendants called plaintiff's counsel to seek their consent to this enlargement but was unable to reach them.

Defendants request this enlargement because this office requires additional time to schedule depositions as I will not be available on the dates proposed by plaintiff. As I informed the Law Department of my departure on February 15, 2008, the Law Department is currently in the process of reassigning responsibility for the litigation and respectfully requests until Friday, February 22, 2008, to submit a proposed schedule for the remaining depositions and to respond to plaintiff's application in full. Although defendants made a good faith effort to confirm the availability of the witnesses and counsel, more time to confirm availability is necessary given the significant existing litigation obligations of replacement counsel.

Accordingly, defendants respectfully request an enlargement of time until February 22, 2008 to respond in full to plaintiff's application. Thank you for Your Honor's consideration of the matters set forth herein.

Respectfully submitted,



John H. Graziadei (JG 1333)
Senior Counsel

cc: Eric Siegle, Esq.
Jonathan Sims, Esq.